

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

TESLA, INC.,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A,"

Defendants,

Case No. W-24-cv-00172-ADA

Judge: Alan D Albright

**DEFENDANT'S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO THE COMPLAINT**

Defendant Slow Slog ("Defendant" hereinafter), by and through its undersigned counsel, hereby move for an extension of seven days from May 22 to respond to the Complaint (D.E. #1), though and including May 29, 2024, and in support thereof state as follows:

1. On April 5, 2024, Plaintiff filed its Complaint. (D.E. #1)
2. On May 7, 2024, Plaintiff submitted the Certificate of Service. (D.E. #17)
3. Defendant has recently retained counsel, and it is necessary to allow sufficient time for the counsel to gather relevant information, review the facts and applicable laws, in order to prepare a comprehensive responsive response.
4. Defendant has not previously requested an extension of time from this Court.

5. Defendant's counsel has communicated with the Plaintiff's counsel on its proposal of extension of time on May 13, 2024. Plaintiff's counsel agreed to Defendant's request for a seven-day extension.
6. Good cause exists to grant this motion. Defendant's request for additional time to respond to the Complaint in this motion is not intended to cause undue delay. Moreover, no party will be prejudiced by the relief requested herein.

**WHEREFORE**, Defendant respectfully requests that the Court grant this motion and extend the time for Defendant to respond to the Complaint for seven days from May 22 to respond to the Complaint (D.E. #1), though and including May 29, 2024, and grant such further relief as the Court deems just and proper.

Respectfully submitted this 14<sup>th</sup> day of May 2024.

By: /s/ Huicheng Zhou  
Huicheng Zhou Esq.  
(Pro hac vice)

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for Plaintiff and all CM/ECF participants.

I also hereby certify that on May 13, 2024, I communicated with the Plaintiff's counsel on this motion and Plaintiff's counsel was agreeable to a seven-day extension.

Date: May 14, 2024

Respectfully submitted

By: /s/ Huicheng Zhou

Huicheng Zhou Esq.

(Pro hac vice)

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